

Remarks:

This amendment is submitted in an earnest effort to advance this case to issue without delay.

The specification has been amended to eliminate some minor obvious errors. No new matter whatsoever has been added.

The claims have been replaced with a set of US-style claims that overcome the formal objections and that clearly define the invention over the applied art.

The primary reference cited against this case, US patent 6,494,450 of Tsurumaki, has a system where sheets P are dropped between a pair of adjustable but fixed plates 74 spaced apart by the exact sheet width, and the plates come to rest against another fixed abutment plate 70 to form a neat stack.

Thus here there is no "shiftable" stabilizing element or means for "shifting the element ... without vertically bending or deflecting the sheets." The system of Tsurumaki operates oppositely, in that the sheets are moved into position one at a time and thus inherently form a perfect stack. There is in fact no moving stack at all. The only thing that moves is the individual sheets relative to three fixed abutment plates.

Thus Tsurumaki clearly does not anticipate the instant invention under §102 because structure -- a "shiftable" stabilizing element and "means for shifting ....without vertically bending or deflecting the sheets" -- is not shown or suggested. Similarly, there is nothing in Tsurumaki to describe how, if somehow part of the stack got misaligned, it could be straightened out. The Tsurumaki reference does not even recognize, much less address, the problem solved by the instant invention, namely that while tamping together a stack sheets get bent under and damaged.

US 1,773,068 of Vienneau shows a system for welding together two sheets in a finger-joint system. This reference has no relevance to a system for aligning sheets in a stack and is irrelevant to the invention.

In US 3,902,214 of Schmitt does not disclose any system for horizontally tamping together sheets in a stack. This reference is irrelevant to main claims 14 and 22. With respect to claim 25, it is noted that the instant invention is aimed at increasing the ease with which the sheets slide on the substrate, not on each other. Schmitt, like Vienneau, adds nothing to the teachings of Tsurumaki to form a valid §103 rejection.

Thus all of the claims are clearly in condition for allowance. Notice to that effect is earnestly solicited.

If only minor problems that could be corrected by means of a telephone conference stand in the way of allowance of this case, the examiner is invited to call the undersigned to make the necessary corrections.

Respectfully submitted,  
K.F. Ross P.C.

//Andrew Wilford//

by: Andrew Wilford, 26,597  
Attorney for Applicant

12 April 2008  
5683 Riverdale Avenue Box 900  
Bronx, NY 10471-0900  
Cust. No.: 535  
Tel: 718 884-6600  
Fax: 718 601-1099  
Email: [email@kfrpc.com](mailto:email@kfrpc.com)

Enclosure:           Corrected version  
                      Substitute Specification  
                      Substitute Abstract  
                      Replacement drawing (4 sheets)